

Consulting Engineers and Scientists

1870 Ogden Drive Burlingame, CA 94010 (650) 292-9100 Fax: (650) 552-9012

27 February 2004

Mr. Winston Perez, Hazardous Materials Specialist County of Los Angeles Fire Department, North County 14425 Olive View Drive Sylmar, California 91342

Subject:

Closure Report for Permitted Waste Treatment Units

at the Price Pfister Facility, 13500 Paxton Street, Pacoima, California

(EKI A20034.00)

Dear Mr. Perez:

On behalf of Price Pfister, Inc., Erler & Kalinowski, Inc. is pleased to submit the enclosed *Closure Report for Permitted Waste Treatment Units*, dated 27 February 2004. This Closure Report was prepared for the Price Pfister facility at 13500 Paxton Street in Pacoima. This document has been prepared to report the completion of closure activities in accordance with the *Closure Plan for Permitted Waste Treatment Units* dated 11 July 2002.

Price Pfister requests written notification from the County of Los Angeles Fire Department to confirm completion of closure of Units 1000, 2000, and 3000.

If you have any questions, please call.

Very truly yours,

ERLER & KALINOWSKI, INC

Steven G. Miller, P.E.

Project Manager

cc:

Mohammad Zaidi, RWQCB Los Angeles Region Lorraine Sedlak, Black & Decker Eileen Nottoli, Allen Matkins



1. INTRODUCTION

On behalf of Price Pfister, Inc. ("Price Pfister"), Erler & Kalinowski, Inc., ("EKI") has prepared this Closure Report for Permitted Waste Treatment Units ("Closure Report"). This report documents the closure and decommissioning of three permitted waste treatment units at the Price Pfister Facility located at 13500 Paxton Street, Pacoima, California (the "Site"; see Figure 1). The Price Pfister facility occupies approximately 27 acres and is bounded by Paxton Street to the north, Louvre Street to the south, Sutter Avenue to the west, and Bradley Avenue to the east. Price Pfister's manufacturing operations at the Site ceased in December 2002. Prior to closure, the Site had been used for the manufacture of plumbing fittings, faucets, and other products. All manufacturing operations have been removed and demolition of all but the southwest corner is planned.

The closure and decommissioning of the three former permitted waste treatment units at the Site was performed in accordance with the *Closure Plan for Permitted Waste Treatment Units* ("Closure Plan"), prepared by EKI and dated 11 July 2002. The Closure Plan was prepared in accordance with the requirements of California Code of Regulations ("CCR") Title 22 66265.112 and the Health and Safety Code ("H&SC"), and was submitted to the County of Los Angeles Fire Department ("CountyFD") on 4 September 2002. The closure and decommissioning activities were performed during the period from 20 September through 18 December 2002. The locations of the former permitted waste treatment units were inspected by Mr. Winston Perez of CountyFD on 18 December 2002.

Based on the discussions during the site visit with Mr. Perez on 18 December 2002, we understand that the only remaining item for completion of closure is removal of the stained concrete structures that were part of the former wastewater treatment area in the central part of Building P. The property will be redeveloped and the improvements in the former waste treatment areas are scheduled for demolition. Any contaminated demolition debris will be disposed at an appropriately permitted off-site facility. EKI will submit a letter to the CountyFD to confirm that this work has been completed.

1.1 Scope and Oversight of Facility Closure

The following three former permitted waste treatment units were at the Site:

- Unit 1000 was an on-Site industrial wastewater treatment system that was permitted as a Permit-by-Rule ("PBR") unit under California's tiered permitting system pursuant to the applicable provisions of CCR Title 22 67450 and the H&SC Section 25200.
- Unit 2000 was an on-Site treatment system for treatment of oily water that operated as a Conditionally Authorized Unit pursuant to H&SC Section 25200.3.



• Unit 3000 was a drum and container rinsing and crushing operation operated as a Conditionally Exempt Unit pursuant to H&SC Section 25201.5.

Price Pfister understands that the City of Los Angeles Fire Department ("CityFD") is the Certified Unified Program Agency ("CUPA") for closure of the above units. The CityFD contracts with the CountyFD, which acts as the lead agency and oversees permitting and closure of the subject units at the Price Pfister Facility on behalf of the CityFD. Oversight of the closure activities at the Site was performed by Mr. Winston Perez, Hazardous Materials Specialist of the CountyFD.

Mr. Kenny Hom, Manager, Health, Safety & Environmental for BDHHI Lake Forest is the contact for Price Pfister. Mr. Steven G. Miller, P.E. of EKI is the independent registered engineer responsible for reviewing the implementation of closure activities and preparation of this report on behalf of Price Pfister.

In connection with closure of the treatment units, Price Pfister removed and properly disposed of hazardous and non-hazardous wastes, decontaminated the equipment used to handle hazardous materials and wastes, and dismantled and removed all equipment from the facility for reuse, recycling by scrapping, or disposal at appropriate facilities. These closure activities were performed by Patriot Environmental Services of Santa Clarita, California ("Patriot") and are summarized in Section 3 of this report.

Notification of Closure and Coordination with Agencies

Price Pfister provided the CUPA with advance notification of its intention to begin closure of the permitted units in its letter to the CountyFD and City FD, dated 4 September 2002 (see Appendix A). In a letter dated 31 December 2002, Price Pfister informed the City of Los Angeles Bureau of Sanitation ("LABS") that all industrial wastewater discharge at the Site had ceased in September 2002 and that the closure activities for Unit 1000 (industrial waste discharge Permit No. W-247773) had been completed (Appendix A).

1.2 Report Organization

Section 2 of this Closure Report describes the former permitted waste treatment units (Units 1000, 2000 and 3000), the associated treatment processes, and an estimate of the maximum inventory of hazardous waste stored on-Site. Section 3 describes the closure activities and the procedures used for disposal of hazardous wastes and the cleaning and disposal of equipment used to handle hazardous materials and wastes. Section 4 concludes the report and requests closure of the permitted hazardous waste treatment units. Section 5 provides a list of documents referenced in this report.



2. DESCRIPTION OF THE PERMITTED TREATMENT UNITS

2.1 Unit 1000 - Process Wastewater Treatment System

The process wastewater treatment system, Unit 1000, was located in Building P as shown on Figure 2. Process wastewater was generated from the following operations (Price Pfister, 1999):

- Rack Electroplating Operations generated rinses after plating (copper, nickel and chrome) and rinses after acid and alkaline cleaning.
- Barrel Electroplating Operations generated rinses after copper and nickel plating and rinses after acid and alkaline cleaning.
- Rack and Part Stripping generated acidic rinses after copper and nickel plating.
- Rotoclone Scrubber (Polishing) generated water used to contain the dust produced from the polishing and buffing operations.
- Fabrication generated alkaline and acid cleaning rinses.
- Machining/Washing generated alkaline and acid cleaning rinses.
- Effluent from Unit 2000 Oil Staging Unit generated oily wastewater that originated in various operations, including wash water from screw machine operations, mop water from floor cleaning, and rinsate from the raw material drum and container rinsing operation.

The volume of wastewater generated at the Site ranged from 60,000 gallons per day ("gpd") to 85,000 gpd (personal communication with Mr. Jose Arambulo of Price Pfister on 7 May 2002).

Unit 1000 consisted of twenty-two aboveground tanks and nine underground containers, of which one was a four-stage clarifier. The twenty-two aboveground tanks included numerous holding tanks, feed tanks, a lamella clarifier, and three multimedia sand filters. In addition to the twenty-two tanks, the Unit 1000 also included a filter press and auxiliary equipment, such as pumps, piping, valves, mixers, and drums. A layout of Unit 1000 and a list of the tanks and containers included in the treatment unit are presented on Figure 3.

All process wastewater was treated in Unit 1000 prior to discharge to the sanitary sewer. The treatment operations included hexavalent chromium reduction, neutralization, flocculation, clarification, filtration, filter press, sludge thickening, and heavy metal precipitation as described below.



2.1.1 Wastewater Treatment Process Description

The process flow diagram for the former wastewater treatment system is shown in Figure 4 as referenced in the On-Site Hazardous Waste Treatment Notification Form (Price Pfister, 2001) and the Industrial Discharge Fact Sheet (Price Pfister, 1999).

The acid and alkali streams from the plating operations, effluent from acid and alkali scrubbers, effluent from rack and part stripping operations, and all other metal-containing streams, except those that contained hexavalent chromium and copper, flowed to the pH adjustment/precipitation tanks (containers 7 and 8 on Figures 3 and 4).

The chromium-bearing waste stream from the electroplating process was collected in Holding Pit 1 and treated in containers 5 and 6. This waste stream, which also included the chrome scrubber overflow, acid waste from the deionization ("DI") final rinse and the DI backwash, was treated with sulfuric acid and sodium metabisulfite in container 5 to reduce hexavalent chromium to trivalent chromium. Container 6 is used as a second-stage reduction tank.

The copper-bearing waste stream, which included alkali waste and waste from the electroplating process, the DI final rinse, and the DI backwash, was collected in Holding Pit 2 and treated in containers 3 and 4 prior to entering the neutralization tank. Copper was precipitated from the waste stream with aluminum chloride and lime.

These chromium-bearing and copper-bearing waste streams were combined in the second-stage of the chrome reduction tank (container 6) and then were pumped to the second-stage of the neutralization tank (container 7), where they were mixed with the rest of the process waste streams.

All process waste streams then entered the two-stage neutralization tank for pH adjustment (containers 7 and 8). The acid/alkali overflow rinses from the electroplating process (rack and barrel) flowed directly to the first-stage neutralization tank (container 7). Other waste streams were collected in sumps and were then pumped to the first-stage neutralization tank. Unit 1000 also treated the oily wastewater generated in Unit 2000, the Oil Staging Unit that was pumped via overhead piping into the brass plating sump in Building P that in turn flowed to the first-stage pH adjustment tank (container 7).

After initial precipitation of metals by adjusting the pH in the two-stage neutralization tank (containers 7 and 8), the process wastewater was pumped to a lamella clarifier and polymers were added for flocculation. Solids were separated in the lamella clarifier, and the clarified liquid was discharged to a four-stage, below grade clarifier where it was neutralized by addition of sulfuric acid. The treated effluent was then pumped through a multimedia sand filter system for further polishing prior to being discharged to the sewer in accordance with the provisions of a LABS permit (Permit No. W-247773). The settled sludge from the lamella clarifier was pumped through a series of sludge holding tanks to a filter press. The filtrate was returned to the second-stage pH adjustment tank (container



8), while the filter cake was kept in hazardous waste bins and manifested for off-Site disposal. The backwash from the multimedia sand filter system also returned to the pH adjustment/precipitation tank.

2.2 Unit 2000 – Oil Staging Unit

The Oil Staging Unit (Unit 2000) consisted of one oil-water separator, two holding tanks and one below grade container. The estimated monthly volume of oily water treated in Unit 2000 was 10,000 gallons (Price Pfister, 2001). The treatment process consisted of oil/water phase separation, pH adjustment, precipitation, flocculation, and filtration. This unit was used to treat oil/water mixtures from various operations, including wash water from screw machine operations and mop water from floor cleaning. These waste streams and rinsate from the raw material drum and container rinsing operation (Unit 3000) were collected in a below-grade tank, and then were pumped to an oil-water separator (Figure 4). The separated oil mixture (i.e., oil with some water) was collected and transported off-Site for recycling. The effluent water was pumped into holding tanks prior to being transferred to a treatment tank operated on a batch basis. Sodium hydroxide was added to the effluent water from the oil-water separator for pH adjustment, followed by flocculation with aluminum chloride. After flocculation, the solids were separated by gravity filtration through a filter cloth. The clear effluent was transferred to Unit 1000, and the sludge was transported off-Site for recycling.

2.3 Unit 3000 - Drum and Container Rinsing and Crushing

Unit 3000 consisted of one below-grade tank. The estimated monthly amount of waste treated with this unit was 5,000 pounds (Price Pfister, 2001). The drums and containers were rinsed or steam cleaned in the tank, and the rinsate was transferred to Unit 2000 for further processing. The cleaned drums and containers were reused at the Site or were sent off-Site for recycling.

2.4 Hazardous Waste Inventory

Based on information provided by Price Pfister (2002), the maximum annual quantities of waste generated and the maximum quantities of hazardous wastes treated on-Site in former permitted waste treatment units 1000, 2000, and 3000 are estimated to be as follows:

- The process wastewater generated from the entire facility varied from 60,000 gpd to 85,000 gpd (personal communication with Mr. Arambulo of Price Pfister on 7 May 2002). After treatment in Unit 1000, the effluent was discharged into the sanitary sewer under LABS Permit No. W-247773.
- The maximum annual quantity of filter cake (which is classified as a Resource Conservation Recovery Act or "RCRA" F006 waste) generated in Unit 1000 was 674 tons in 1999. The filter cake was stored at the Site in two 10-ton covered



roll-off bins in the hazardous materials storage area (Building X; see Figure 2). When the two bins were full or nearly full, the waste was transported for appropriate off-Site disposal. Therefore, the estimated maximum quantity of RCRA F006 waste present at the Site at any given time was approximately 20 tons (personal communication with Mr. Arambulo of Price Pfister on 9 May 2002).

- The estimated monthly volume of oily water treated in Unit 2000 was 10,000 gallons (Price Pfister, 2001). Therefore, approximately 120,000 gallons of oily water were treated in Unit 2000 annually.
- The maximum annual quantity of used oil recovered in Unit 2000 was approximately 7,000 gallons in 1997. Used oil was typically stored in drums in the Oil Staging Area for less than 90 days. The used oil was generally shipped off-Site for recycling in quantities of 500 to 600 gallons (personal communication with Mr. Arambulo of Price Pfister on 9 May 2002). Therefore, the estimated maximum quantity of used oil stored on-Site at any given time was 500 to 600 gallons.
- The quantity of solid waste generated in Unit 2000 (residual sludge from flocculation, precipitation, filtration) in 1997 was approximately 2 tons.
 According to information provided by Price Pfister, solid waste generated in Unit 2000 was transported off-Site in 300- to 400-pound batches (personal communication with Mr. Arambulo on 15 May 2002). Therefore, the estimated maximum quantity of solid waste generated and stored at Unit 2000 was 400 pounds.
- The estimated monthly quantity of waste treated in Unit 3000 was 5,000 pounds (Price Pfister, 2001). This included both plastic and metal drums that were rinsed and recycled. The maximum annual quantity of waste generated in Unit 3000 was approximately 30,000 pounds of metal drums in 1997. According to information provided by Price Pfister, the empty metal drums were shipped off-Site three times per year. Therefore, the estimated maximum quantity of drum waste present on-Site at any given time was approximately 10,000 pounds.



3. SUMMARY OF CLOSURE ACTIVITIES

All waste disposal and cleaning activities related to closure of the three permitted waste treatment units were performed by Price Pfister and its contractor, Patriot.

This section of the Closure Report summarizes the methods used for:

- removal and disposal of hazardous wastes pursuant to CCR Title 22 66265.112(b)(3);
- decontamination of equipment used to handle hazardous materials (e.g., tanks, containers, secondary containment structures, piping, and air emission control equipment) pursuant to CCR Title 22 66265.112(b)(4); and
- removal from the Site of all equipment associated with the permitted waste treatment units.

Pursuant to CCR Title 22 66265.112(b)(6), a schedule of closure activities performed by Patriot and Price Pfister is presented in Table 1. Photographs documenting the closure activities are provided in Appendix B. Certificates of tank cleaning performed by Patriot area provided in Appendix C. Copies of waste manifests associated with closure of the permitted waste treatment units and disposal of waste plant chemicals are provided in Appendix D.

3.1 Removal of Wastes

All wastewater generated by the facility up to the time of closure of the permitted units was processed in the permitted units and discharged to the sewer before the units were cleaned. All plant waste chemicals as wells as chemicals and other raw materials used in waste treatment processes were removed from storage tanks and/or containers and properly disposed off-Site in accordance with applicable regulations. Chemicals that were suitable for use at other Price Pfister facilities were transported off-Site to these other facilities in accordance with applicable regulations.

Some cleaning of chemical storage tanks and other containers occurred prior to termination of the wastewater treatment processes and, consistent with permits, the rinsate from cleaning these tanks and containers was treated in the permitted wastewater treatment units. Those cleaning rinsates and other wastes generated during the cleaning process that could not be treated on-Site were properly disposed of off-Site in accordance with applicable regulations.

After cleaning was completed, waste treatment system equipment such as steel tanks, containers and piping was removed by Patriot (see Photographs in Appendix B), and was transported off-site for reuse, recycling or disposal.



Copies of waste manifests for disposal of waste chemicals, cleaning rinsates, and demolition debris that was disposed off-Site are provided in Appendix D.

3.2 Cleaning Procedures

Cleaning performed by Patriot was conducted in accordance with Price Pfister's existing Health and Safety Plan and Spill Contingency Plan. Patriot also prepared its own site-specific Health and Safety Plan outlining specific hazards and protective measures to be used during decontamination and equipment removal, transport and disposal activities.

Price Pfister documented the completion of cleaning activities and maintained appropriate documentation regarding the disposal of waste and equipment. Certificates of tank cleaning performed by Patriot area provided in Appendix C, and copies of waste manifests for disposal of any drained contents, rinse water or solid residue generated during the cleaning process as well as demolition debris are provided in Appendix D.

3.2.1. Tank, Container, and Secondary Containment Area Cleaning

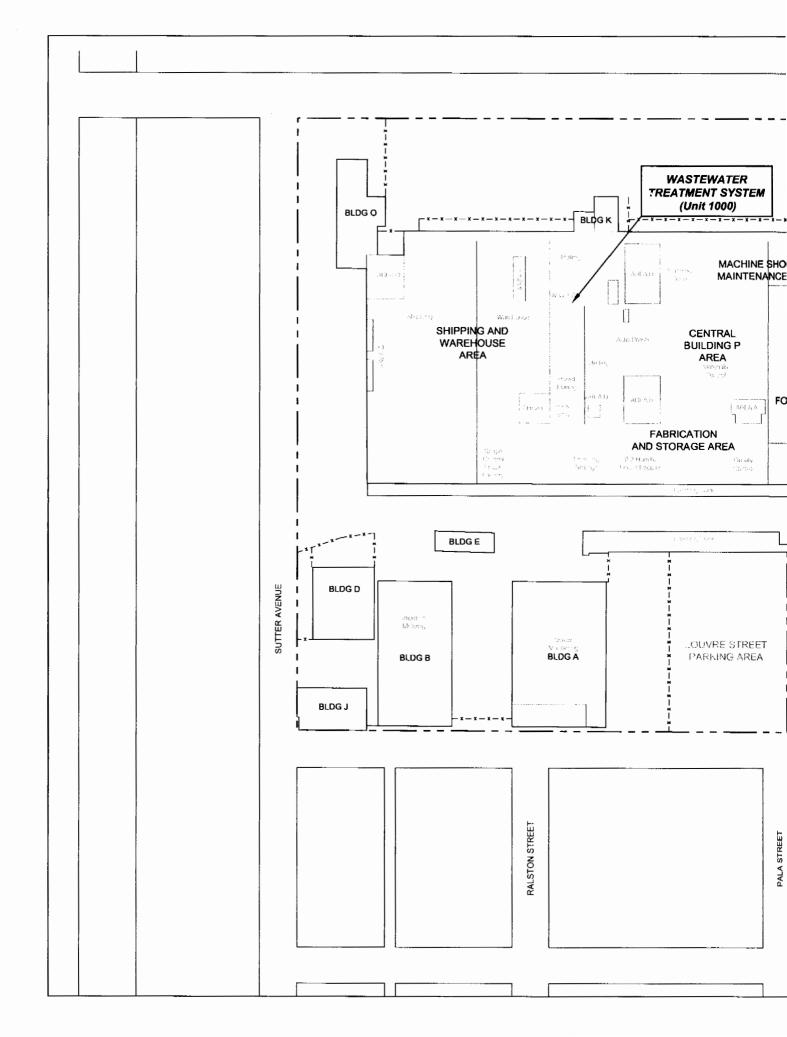
Procedures for cleaning the interiors of tanks, containers, and secondary containment areas included the following:

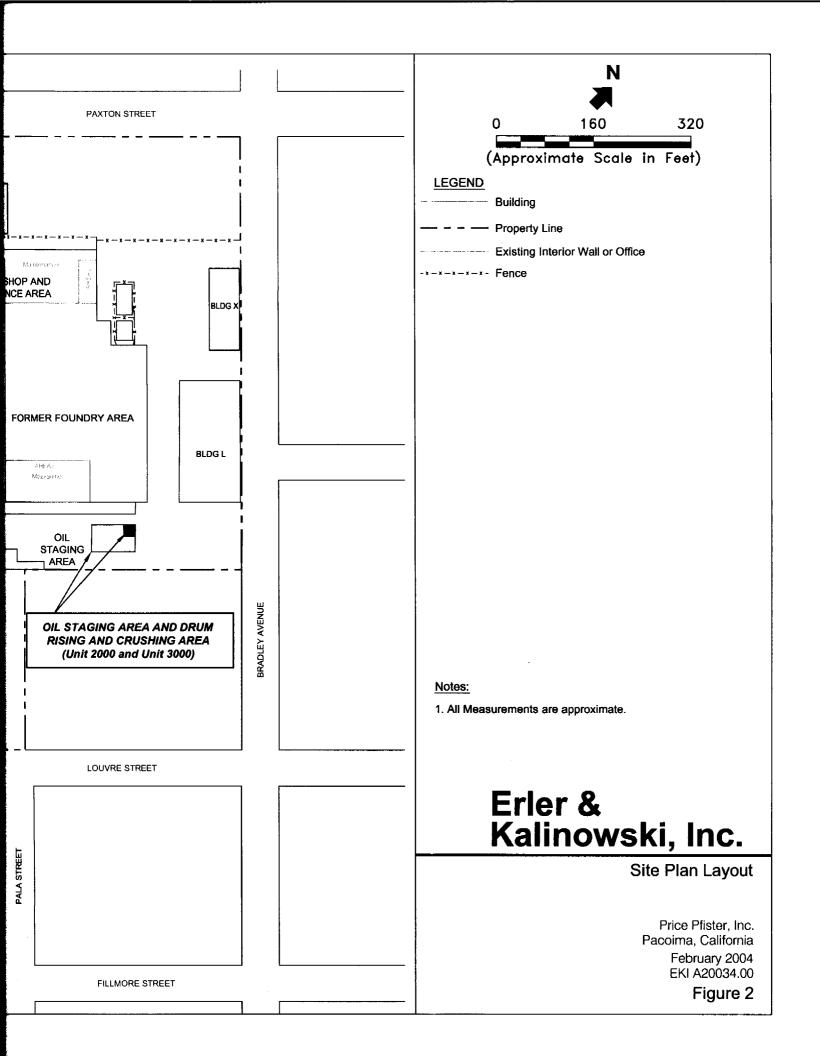
- 1. Prior to cleaning, tanks and containers were drained until empty as described in CCR Title 22 66261.7, as applicable.
- 2. The interior of each tank and container was inspected for solid residue, and any residue was removed as described in CCR Title 22 66261.7, as applicable.
- 3. The interior of each tank, container and secondary containment area was pressure-washed and triple-rinsed.
- 4. All drained contents, rinse water, and solid residue generated during the cleaning process were collected for appropriate off-site treatment or disposal.
- 5. Steel tanks and containers were removed from the Site for reuse, recycling, or appropriate off-Site disposal. Concrete tanks, containers, and secondary containment areas located above grade were demolished, and the concrete debris was disposed off-site.

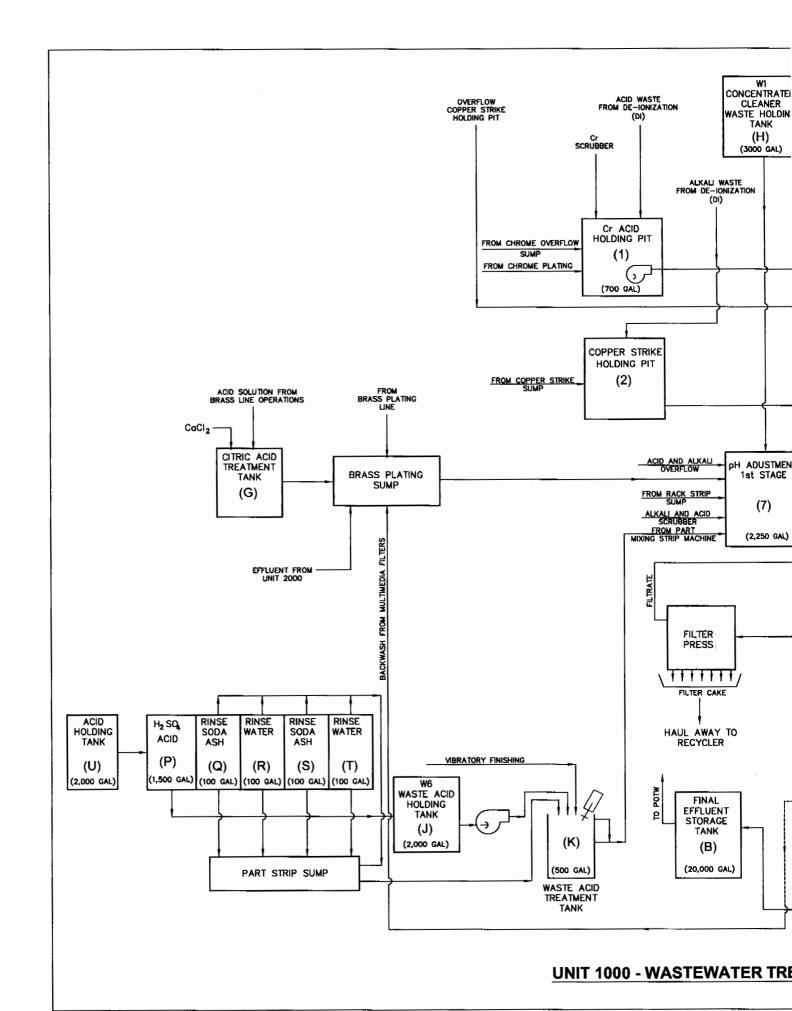
3.2.2. Pipe Cleaning

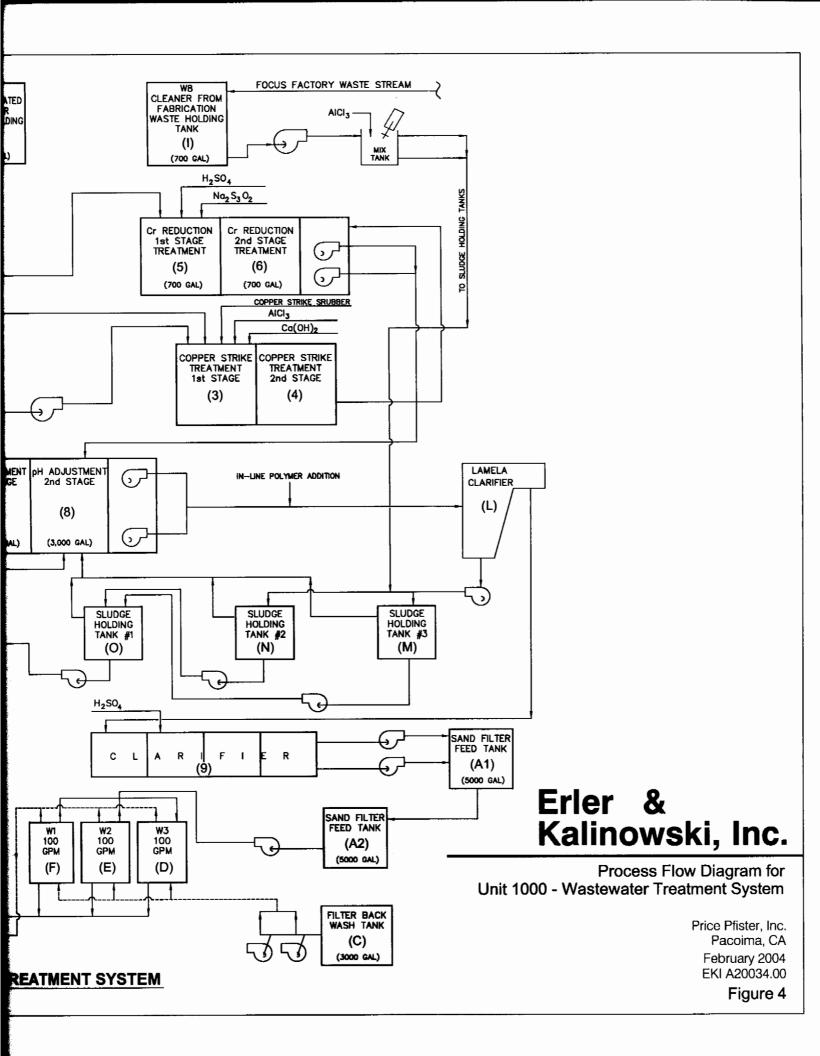
Procedures for pipe cleaning (and cleaning of associated pumping equipment) included the following:

1. Prior to cleaning, the piping and pumping equipment were drained until empty.









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APPENDIX D

Waste Manifests

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TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS.
(Generators who submit hazardous waste for transport out-of-state, produce completed copy of this copy and send to DTSC within 30 days.)

j	WINIEODAL HATABBOUS	1. Generator's US EP	A ID No.	Manifest Document	No.	2. Page 1	Information	n in the shaded areas
1	WASTE MANIEEST	CADIOIOIS	3 3 3 4 1 9	514181	55	ایتیا	is not requi	ired by Federal law.
	3. Generator's Name and Mailing Address				A. State A	Manifest Dacument N	lumber 2	185485
	1080 SUTTER ST ACCIMA CA 9133 4. Generotor's Phone (3018)686	{ 43 6 2		,	B. State C	enerator's ID		
-	5. Transporter 1 Company Name		US EPA ID Number			ransporter's ID [Rese		
	MARTIN ENVISERY		AD0101016	2 8 6 3 6				24-9136
	7. Transporter 2 Company Name: ()	B. } (→ 1)	US EPA ID Number			ransporter's ID [Rese	orved.)	
-	Designated Facility Name and Site Address	255 P CERVICE	US EPA ID Number			acility's ID		
	U.S. FILTER RECOV 2375 ANGELES EAV	EKT SEKVICE:	5 A D 0 6 7 0	୍ର୍ଠ୍ନ୍ର୍ଥ	H. Facility	's Phone	800)2	66-7747
-	11. US DOT Description (including Proper St			12. Con	lainers	13. Total	14. Unit	T
-	"RQ" WASTE CORR	OSIVE LIQUID	ACIDIO.	No.	Туре	Quantity	Wt/Vol	1. Waste Number State / 92
	"RQ" WASTE CORR INORGANIC, N.O.S. 8: UN3254, PGII	(CHROMIC ACI (D002)	D),	1100	アノア	0 12 12 10 10	G	_{ЕРА} /Ф⊕02
	ь.							State
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	Anna Carlotte Comment					1 1 1 1		EPA/Other
٦	J. Additional Confirmediation	SOLUTION / A	ADD'L STATE	CODE 723	K. Handli	ng Codes for Waste	Listed Abo	1
	U.S. FILTER PRO			1	° 0	\	<i>b</i> .	
			JOB# 5020	35)	с.		d.	
'	15. Special Handling Instructions and Addition WEAR APPROPRIAT 2000 N.A.E.R.GUIDE 24 HOUR EMERGEN	onal Information F PERSONAL	PROTECTIVE	EQUIPME	NT 5-3 9 2	4 (RS	1650	(3)
1	 GENERATOR'S CERTIFICATION: I hereb marked, and labeled, and are in all res 	by declare that the contents of opects in proper condition for t	this consignment are fully transport by highway acco	and accurately describ	ed above b	y proper shipping no I and national gover	ame and are	classified, packed, lations.
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	and the environment; OR, if I am a sma available to me and that I can afford.							
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_	17. Transporter 1 Acknowledgement of Rece Printed/Typed Name	ipt of Materials	Signatura	9/1	#1		Mon	nth Day Y
_	18. Transporter 2 Acknowledgement of Rece	ipt of Materials	mil	s a rol	ay.		0	9 2 6 0
P	Printed/Typed Name		Signature				Mon	ath Day Y
1	19. Discrepancy Indication Space					,		
						7.		
	20. Facility Owner or Operator Certification Printed/Typed Name	of receipt of hazardous mate	rials covered by this mani	est except as noted in	Item 19.		Mon	oth Day Y
	MAMAS N	1200)00	1/1/1			1	ام ا	91 7/1

CENTER 1-800-424-8802: WITHIN CALIFORNIA, CALL 1-800-852-755

". CASE C. EMERSLINGY OR SPILL, CALL THE NATIONAL REST

	William Johrs	The level fill	1/101:	2 2 6	2 2
	17. Transporter 1 Acknowledgement of Receipt of Materials	60.			
	FRANK SAICEON JE	In he salcych h	Month	2 2 2 0	Year 2 2
	18. Transporter 2 Acknowledgement of Receipt of Materials	· //	.*		
ĺ	Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except

neos

DO NOT WRITE BELOW THIS LINE.

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